

**LAW OFFICES OF DALE K. GALIPO**

Dale K. Galipo (SBN 144074)  
E-mail: dalekgalipo@yahoo.com  
Hang D. Le (SBN 293450)  
E-mail: hlee@galipolaw.com  
21800 Burbank Blvd., Suite 310  
Woodland Hills, CA 91367  
Tel: (818) 347-3333; Fax: (818) 347-4118

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JENNIE QUAN, individually and as  
successor in interest to BENJAMIN  
CHIN, deceased,

Plaintiffs,

vs.

COUNTY OF LOS ANGELES;  
MARISOL BARAJAS; HECTOR  
VAZQUEZ; and DOES 3-10, inclusive,

Defendants.

Case No. 2:24-cv-04805-MCS-KS

*Assigned to:*

Hon Mark C. Scarsi

Hon. Mag. Judge Karen L. Stevenson

**JOINT STATEMENT OF THE CASE**

1 **TO THE HONORABLE COURT:**

2 Pursuant to the Court's Order re: Jury/Court Trial, Plaintiff Jennie Quan and  
3 Defendants County of Los Angeles, Marisol Barajas, and Hector Vazquez, by and  
4 through their respective counsel of record, hereby submit this Joint Statement of the  
5 Case:

6 This case arises out the fatal shooting of Benjamin Chin by County of Los  
7 Angeles Sheriff's Department Deputies Marisol Barajas and Hector Vazquez on June  
8 19, 2023, near the intersection of Crooked Creek Drive and Diamond Bar Boulevard  
9 in Diamond Bar, California. The Plaintiff is Jennie Quan, Mr. Chin's mother. The  
10 Defendants are Deputies Marisol Barajas, Hector Vazquez, and the County of Los  
11 Angeles.

12 Plaintiff contends that Deputies Marisol Barajas and Hector Vazquez used  
13 excessive and unreasonable force against Mr. Chin. Plaintiff further contends that the  
14 deputies were negligent in their conduct and use of force against Mr. Chin. Plaintiff  
15 seeks damages to the extent permitted by law.

16 Defendants deny these claims and contend that the deputies' actions and use of  
17 force were reasonable under the circumstances.

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1 Respectfully submitted,

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3 DATED: January 12, 2026

LAW OFFICES OF DALE K. GALIPO

4  
5 By /s/ Hang D. Le

6 Dale K. Galipo

7 Hang D. Le

8 Attorneys for Plaintiff

9  
10  
11 DATED: January 12, 2026

HURRELL CANTRALL LLP

12  
13 By /s/ Jerad J. Miller\*

14 Thomas C. Hurrell

15 Jerad J. Miller

16 Attorneys for Defendants

17  
18 \*The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose  
19 behalf the filing is submitted, concur with the filing's content and have authorized the  
20 filing.